

Exhibit D

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CONCERNED PASTORS FOR
SOCIAL ACTION, et al.,

Case No. 16-10277

Plaintiffs,

v.

Hon. David M. Lawson

NICK A. KHOURI, et al.,

Defendants.

/

DECLARATION OF CORNELIO PEREZ

I, Cornelio Perez, do hereby affirm and state:

1. I have lived in Flint, Michigan for my whole life. For the last five years, I have lived in the same house.
2. On August 19, 2019, the City dug up my service line. I am not sure what the line was made of because I wasn't home when the work was being done.
3. The City's service line replacement work damaged my lawn. To identify the material of my service line, the City dug around the water shut-off valve. The City did not add enough dirt back in around the valve to fill the hole they created, and never returned to my home after they dug up my service line. Today, the shut-off valve sticks several inches out of the ground and is surrounded

by a crater that is a couple of feet wide and several inches deep. This crater is clearly visible and was not there before the City dug up my service line.

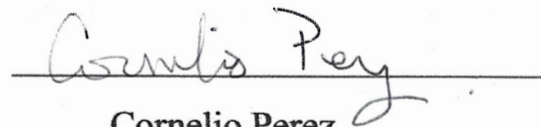
4. The City's damage to my lawn has made it more difficult for me to maintain my front lawn. The crater that the City left in my lawn catches lots of garbage and leaves, making it harder to mow my lawn.

5. I received a doorhanger from the City that said they had evaluated whether I needed property repairs at my address and concluded that nothing else needed to be done. I was surprised—I thought the City was going to come back and finish fixing my lawn. In fact, I have held off on fixing it myself for years because I thought the City was going to come back.

6. I disagree with the City's determination that restoration is complete at my home and I plan to contact the City to let them know about my concerns.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 23, 2023


Cornelio Perez